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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

GANESH SANKAR, ERIKA TITUS-LAY,
JARED CAVANAUGH, AND KIMBERLY
VONGNALITH, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

CALIFORNIA NORTHSTATE
UNIVERSITY, LLC,

Defendant.

Lead Case No. 2:24-cv-00473-DAD-JDP
Member Case No. 2:24-cv-01231-DAD-
JDP

JOINT STATUS REPORT REGARDING SETTLEMENT

Plaintiffs Ganesh Sankar, Erika Titus-Lay, Jared Cavanaugh, and Kimberly Vongnalith
("Plaintiffs") and Defendant California Northstate University, LLC ("Defendant") (collectively,

the “Parties”), through their undersigned counsel, submit this Joint Status Report pursuant to the Court’s December 6, 2024 Order. ECF No. 32.

On December 5, 2024, the Parties notified the Court that they had reached an agreement on the material terms of a class settlement. ECF No. 31. The Court subsequently vacated all dates and deadlines, ordering the Parties to file a motion for preliminary approval of the class settlement by January 21, 2025, or submit a joint status report regarding settlement progress. ECF No. 32.

Since notifying the Court of the settlement, the Parties have been diligently working to finalize the settlement agreement and related exhibits, including class notices, reviewing bids for notice and settlement administration, and preparing other supporting documents for the motion for preliminary approval.

Initial drafts of the settlement documents have been completed and are currently under review and revision by the Parties. The Parties anticipate completing all settlement documents within the next 21 days, and Plaintiffs anticipate filing a motion for preliminary approval no later than February 11, 2025.

WHEREFORE, the Parties respectfully request that the Court grant Plaintiffs until February 11, 2025, to file a motion for preliminary approval of the class settlement or the Parties shall provide the Court with a joint status report on settlement at that time.

Dated: January 21, 2025

Respectfully submitted,

For Plaintiffs:

For Defendant:

By: /s/Andrew G. Gunem
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By: /s/ Bethany G. Lukitsch
(as authorized on 1/21/2025)
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Attorneys for Plaintiffs

ATTESTATION

I, Andrew G. Gunem, am the ECF user whose identification and password are being used to file this Stipulation. I hereby attest that Bethany G. Lukitsch, attorney for Defendant, has concurred in this filing.

Dated: January 21, 2025

By: /s/ Andrew G. Gunem

(PROPOSED) ORDER

Based on the parties' Joint Status Report on Settlement,

IT IS HEREBY ORDERED that Plaintiffs shall move for preliminary approval of the class settlement or the Parties shall provide the Court with a joint status report on settlement by February 11, 2025.

IT IS SO ORDERED
